

**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**3: 14-cr-00039-JO**

**v.**

**INDICTMENT**

**RAUL REYES RAMIREZ,**

**21 U.S.C. §§ 841(a)(1), (b)(1)(B);  
(b)(1)(C); 846; and 853**

**Defendant.**

**THE GRAND JURY CHARGES:**

**COUNT 1:**

**[Conspiracy to Distribute and Possess with the Intent to Distribute Heroin]**

Beginning on a date unknown to the Grand Jury and continuing up to December 20, 2013, in the District of Oregon, and elsewhere, RAUL REYES RAMIREZ, defendant herein, did knowingly and willfully combine, conspire, confederate and agree with other persons, both known and unknown to the Grand Jury, to distribute and possess with the intent to distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846;

The Grand Jury further charges, pursuant to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B), that this violation involved one hundred grams or more of a mixture or substance containing a detectable amount of heroin.

In furtherance of this conspiracy, and to effect and accomplish its objectives, the defendants and other co-conspirators committed one or more of the following overt acts:

**OVERT ACTS**

1. As listed in Counts 2-3, below.
2. On or about December 20, 2013, in the Western District of Washington, **RAUL REYES RAMIREZ**, defendant herein, did knowingly and intentionally possess with intent to distribute 100 grams or more of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

All in violation of Title 21, United States Code, Section 846.

**COUNT 2**

**(Distribution of Heroin)**

On or between December 10 and December 17, 2013, in the District of Oregon, **RAUL REYES RAMIREZ**, defendant herein, did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT 3**

**(Distribution of Heroin)**

On or about December 19, 2013, in the District of Oregon, **RAUL REYES RAMIREZ**, defendant herein, did knowingly and intentionally distribute heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**CRIMINAL FORFEITURE ALLEGATION**

Upon conviction of the controlled substance offenses alleged herein, **RAUL REYES RAMIREZ**, defendant herein, shall forfeit to the United States pursuant to Title 21, United States

Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violation.

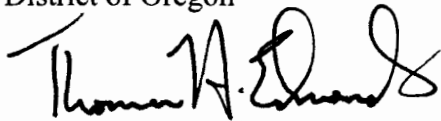
Dated this 22 day of January 2014.

A TRUE BILL

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OFFICIATING FOREPERSON

Presented by:

S. AMANDA MARSHALL  
United States Attorney  
District of Oregon



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THOMAS H. EDMONDS, OSB #90255  
Assistant United States Attorney